

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

BBY SOLUTIONS, INC., BEST BUY STORES,
L.P., and BESTBUY.COM, LLC,

Plaintiffs,

v.

KARRIE-LEE KARREMAN, ELISE
MADELEINE PITRE,
STEWART FOTHERINGHAM, and
2182273 ONTARIO, INC.,

Defendants.

CIVIL ACTION NO.:10-cv-04726-MJD-AJB

JURY TRIAL DEMANDED

**PLAINTIFFS' APPLICATION FOR ENTRY OF DEFAULT BY CLERK AGAINST
DEFENDANTS KARRIE-LEE KARREMAN, ELISE MADELEINE PITRE, STEWART
FOTHERINGHAM, AND 2182273 ONTARIO, INC.**

Plaintiffs BBY Solutions, Inc. Best Buy Stores, L.P. and Bestbuy.com, LLC, move for entry of a default by the Clerk, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, against Defendants Karrie-Lee Karreman, Elise Madeleine Pitre, Stewart Fotheringham, and 2182273 Ontario, Inc., for failure to answer or otherwise defend themselves in response to Plaintiffs' Complaint, as required by law. Plaintiffs' motion is based on the Declaration of Kelly M. McLain, filed concurrently.

Respectfully submitted this 25th day of March, 2011.

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

/s/ Kelly M. McLain

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BESTBUY.COM, LLC**